

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF MISSISSIPPI
NORTHERN DIVISION

MISSISSIPPI STATE CONFERENCE OF
THE NATIONAL ASSOCIATION FOR
THE ADVANCEMENT OF COLORED
PEOPLE; DR. ANDREA WESLEY; DR.
JOSEPH WESLEY; ROBERT EVANS;
GARY FREDERICKS; PAMELA
HAMNER; BARBARA FINN; OTHO
BARNES; SHIRLINDA ROBERTSON;
SANDRA SMITH; DEBORAH HULITT;
RODESTA TUMBLIN; DR. KIA JONES;
MARCELEAN ARRINGTON; VICTORIA
ROBERTSON,

Plaintiffs,

v.

STATE BOARD OF ELECTION
COMMISSIONERS; TATE REEVES, *in his
official capacity as Governor of Mississippi;*
*LYNN FITCH, in her official capacity as
Attorney General of Mississippi;* MICHAEL
WATSON, *in his official capacity as
Secretary of State of Mississippi,*

Defendants,

AND

MISSISSIPPI REPUBLICAN EXECUTIVE
COMMITTEE

Intervenor-Defendant.

PLAINTIFFS' NOTICE OF INTENT TO SERVE SUBPOENA FOR DEPOSITION

YOU ARE HEREBY NOTIFIED, pursuant to Rule 45 of the Federal Rules of Civil Procedure,
that Plaintiffs intend to serve a subpoena for deposition upon Madalan Lennep.

A copy of the subpoena is attached hereto as Exhibit "A."

[Signature Page Follows]

Dated: November 20, 2023

/s/ Joshua Tom

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Attorneys for Plaintiffs

CERTIFICATE OF SERVICE

I, Joshua Tom, do hereby certify that I have this day electronically filed the foregoing document with the Clerk of the Court using the ECF system, which sent notification of such filing to all counsel of record.

This the 20th day of November, 2023.

/s/ Joshua Tom
Joshua Tom

UNITED STATES DISTRICT COURT
for the
Southern District of Mississippi

MS State Conf. of NAACP, et al.,

Plaintiff

v.

State Bd. of Election Commissioners, et al.,

Defendant

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)
)
)
)

Civil Action No. 3:22-cv-734-DPJ-HSO-LHS

SUBPOENA TO TESTIFY AT A DEPOSITION IN A CIVIL ACTION

To:

Madalan Lennep, Elections Consultant for the Mississippi Secretary of State

(Name of person to whom this subpoena is directed)

Testimony: YOU ARE COMMANDED to appear at the time, date, and place set forth below to testify at a deposition to be taken in this civil action. If you are an organization, you must promptly confer in good faith with the party serving this subpoena about the following matters, or those set forth in an attachment, and you must designate one or more officers, directors, or managing agents, or designate other persons who consent to testify on your behalf about these matters:

Place: Mississippi Attorney General's Office
550 High Street, Suite 1100, Jackson, MS 39205

Date and Time:
12/18/2023 9:00 am

The deposition will be recorded by this method: Veritext stenographer and videographer

Production: You, or your representatives, must also bring with you to the deposition the following documents, electronically stored information, or objects, and must permit inspection, copying, testing, or sampling of the material:

The following provisions of Fed. R. Civ. P. 45 are attached – Rule 45(c), relating to the place of compliance; Rule 45(d), relating to your protection as a person subject to a subpoena; and Rule 45(e) and (g), relating to your duty to respond to this subpoena and the potential consequences of not doing so.

Date: 11/20/2023

CLERK OF COURT

OR

Signature of Clerk or Deputy Clerk

J Tom

Attorney's signature

The name, address, e-mail address, and telephone number of the attorney representing (*name of party*) _____
MS State Conf. of NAACP, et al. _____, who issues or requests this subpoena, are:

Joshua Tom, 101 South Congress St., Jackson, MS 39201, jtom@aclu-ms.org, (601) 354-3408

Notice to the person who issues or requests this subpoena

If this subpoena commands the production of documents, electronically stored information, or tangible things before trial, a notice and a copy of the subpoena must be served on each party in this case before it is served on the person to whom it is directed. Fed. R. Civ. P. 45(a)(4).

AO 88A (Rev. 12/20) Subpoena to Testify at a Deposition in a Civil Action (Page 2)

Civil Action No. 3:22-cv-734-DPJ-HSO-LHS

PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 45.)

I received this subpoena for (name of individual and title, if any) _____
on (date) _____.

I served the subpoena by delivering a copy to the named individual as follows: _____

on (date) _____ ; or

I returned the subpoena unexecuted because: _____

Unless the subpoena was issued on behalf of the United States, or one of its officers or agents, I have also tendered to the witness the fees for one day's attendance, and the mileage allowed by law, in the amount of

\$ _____.

My fees are \$ _____ for travel and \$ _____ for services, for a total of \$ 0.00 _____.

I declare under penalty of perjury that this information is true.

Date: _____

Server's signature

Printed name and title

Server's address

Additional information regarding attempted service, etc.: